

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	No. 3:18-CR-97
-vs-	:	
	:	(MARIANI, J.)
ROSS ROGGIO,	:	
Defendant	:	

**NUNC PRO TUNC MOTION FOR AN EXTENSION OF TIME TO
FILE POST SUPPRESSION HEARING BRIEF IN OPPOSITION
TO SUPPRESSION**

NOW COMES, Todd K. Hinkley, Assistant United States Attorney for the Middle District of Pennsylvania, who hereby moves the Court *nunc pro tunc* for an extension of time to file its response in this matter.

1. On May 27, 2021, a suppression hearing was held before Judge Mariani in this matter.
2. The Government's post suppression hearing brief was due on or about October 3, 2021.
3. Counsel for the United States inadvertently permitted the due date for its response brief in this matter to elapse without seeking an extension.

4. So that it can adequately address the issues raised on during the suppression hearing, the United States respectfully requests that the Court grant a 30-day extension of time to respond, *nunc pro tunc*.

5. Counsel for defendant concurs in this motion.

WHEREFORE, in light of the above, the United States respectfully requests a 30-day extension of time to file its response in this matter.

Respectfully submitted,

BRUCE D. BRANDLER
Acting United States Attorney

/s/ Todd K. Hinkley
TODD K. HINKLEY
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 5th day of October, 2021, I caused the foregoing Motion to be filed and that Gino Bartolai, Esquire is a filing user under the ECF system. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document and no additional service upon the filing user is required.

/s/ Katherine Sanchez
KATHERINE SANCHEZ
Legal Assistant